

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES, et al.,	)	
	)	
Plaintiffs,	)	
v.	)	No. 1:23-cv-00108-LMB-JFA
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Civil Rule 5(C) and the Protective Order (Dkt. 203), Plaintiffs’ respectfully moves this Court to seal portions of Plaintiffs’ memorandum of law in support of Plaintiffs’ motion for an adverse inference, and to seal portions or all of exhibits 3-11, 15-16, and 18-37 attached to the memorandum. Consistent with the local rule and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are contained in the memorandum of law concurrently filed in support of this motion. A proposed order is attached for the Court’s convenience.

Dated: August 2, 2024

Respectfully submitted,

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